

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JEFFREY BRYANT #244149,

Plaintiff,

v.

Case No. 2:22-cv-12238

Honorable Linda V. Parker

Magistrate Judge Elizabeth A. Stafford

JOHN R. SOLOMONSON, RN and  
SAVITHRI KAKANI, PA-C

Defendants.

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**QUALIFIED PROTECTIVE ORDER**

This matter having come before this Court, upon agreement of the parties through their respective counsel, and the Court being fully advised in the premises.

IT IS HEREBY ORDERED that Defendant is hereby granted a Qualified Protective Order to conduct ex parte meetings with Jeffrey Bryant's treating physicians and medical providers, provided Defendant:

- (a) Does not disclose Plaintiff's protected health information beyond the purpose of this litigation;
- (b) Destroy the protected health information after the litigation is concluded;
- (c) Advises any treating physician that the meeting is being requested by defense counsel, it is not mandatory, and the physician may have his or her own counsel present; and
- (d) Provides a copy of this Order to any treating physician with whom an ex parte meeting is requested in advance of any meeting.

IT IS FURTHER ORDERED that neither Plaintiff, nor anyone on his behalf, is permitted to interfere with the meeting in any way, including contacting the healthcare providers to advise them not to meet with defense counsel.

IT IS SO ORDERED.

s/Elizabeth A. Stafford

Magistrate Judge Elizabeth A. Stafford

Agreed as to form and substance:

/s/ Robin Wagner (w/consent)

BAYAN M. JABER (P85451)

KEVIN M. CALSON (P67704)

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*Attorneys for Plaintiff*

/s/ Eric T. Ramar

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